



Pursuant to Civ. L.R. 7-12, Plaintiffs LOPEZ TAX SERVICE, INC., CARLOS C. LOPEZ, KRISTEENA S. LOPEZ and LATINO TAX PROFESSIONALS ASSOCIATION, LLC, (collectively "Lopez") and Defendant THE INCOME TAX SCHOOL, INC. ("ITS") hereby stipulate and agree to request an extended deadline to complete Early Neutral Evaluation in this case. This stipulation is based on the following:

1) Per local rules, the Court originally ordered the Parties to complete the ENE within 90 days of October 31, 2012, or January 29, 2013.

2) In their November 27, 2012 initial conference call with William Fenwick, the appointed Evaluator, the Parties and Evaluator agreed that it may be reasonable and necessary to extend the ENE deadlines. The parties believe that the ENE will be more effective after each has had the opportunity to conduct their respective depositions. The Lopez parties are scheduled to depose individuals associated with ITS on December 10-12, 2012. ITS has likewise scheduled depositions of the Lopez parties for January 7-9, 2013.

3) The Parties, their counsel, and the Evaluator are available and have agreed to hold the ENE on January 29, 2013.

4) The parties seek to extend the ENE deadline to March 1, 2013, to allow the parties sufficient time to conduct a meaningful evaluation on January 29<sup>th</sup> and to allow for a potential follow-up session, if necessary.

Dated: December 4, 2012

**GAUNTLETT & ASSOCIATES**

By: /s/ Andrew M. Sussman

David A. Gauntlett  
James A. Lowe  
Andrew M. Sussman

Attorneys for Plaintiffs  
Lopez Tax Service, Inc., Carlos C. Lopez,  
Kristeena S. Lopez, and Latino Tax Professionals  
Association, LLC

1 Dated: December 4, 2012

Nicholas Ranallo, Attorney at Law

2 By: /s/ Nicholas Ranallo

3 Nicholas Ranallo  
371 Dogwood Way  
Boulder Creek, CA 95006

4 Christopher E. Gatewood [*Pro Hac Vice*]  
5 THRESHOLD COUNSEL, PC  
1905 Huguenot Road, Suite 200  
6 Richmond, VA 23235  
Telephone: (804) 677-0947  
7 Facsimile: (804) 482-2641  
[chris@thresholdcounsel.com](mailto:chris@thresholdcounsel.com)

8 Attorneys for Defendant  
9 The Income Tax School, Inc.

10  
11  
12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13  
14 Dated: December 5, 2012

15   
UNITED STATES DISTRICT JUDGE